

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF:

CHRISTIAN R. SIMKO

Chapter 7
Case No. 19-40931-tjt
Hon. Thomas J. Tucker

Debtor(s)

**TRUSTEE'S APPLICATION TO EMPLOY
OSIPOV BIGELMAN, P.C., AS COUNSEL FOR TRUSTEE**

Kenneth Nathan, the Chapter 7 Trustee of the bankruptcy estate of Christian R. Simko moves this court for entry of an Order Authorizing Employment of Counsel pursuant to B.R. 2014 and 11 U.S.C. §327.

IN SUPPORT of the application, the Trustee states:

1. On January 22, 2019, Christian R. Simko filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. Kenneth Nathan is the duly appointed Chapter 7 Trustee in this case.
3. The Trustee wishes to employ the law firm of OSIPOV BIGELMAN, P.C., whose attorneys are duly admitted to practice in this Court.
4. The Trustee requires the advice and assistance of counsel for the following purposes:
 - (a) To give the Trustee legal advice with respect to his powers and duties;
 - (b) To prepare on behalf of the Trustee all necessary applications, answers, orders, reports and other legal papers;
 - (c) To conduct negotiations with unsecured creditors, secured creditors and taxing authorities;
 - (d) To pursue Chapter 5 causes of action; and
 - (e) To represent the Trustee in the pending Adversary Proceeding;

(f) To perform all other legal services for the Trustee as may be necessary herein.

5. OSIPOV BIGELMAN, P.C.'s Statement of Disinterestedness is attached hereto as

Exhibit B.

6. The fees of OSIPOV BIGELMAN, P.C., at present are as follows:

Jeffrey H. Bigelman, Esq.	\$350.00/hour
Yuliy Osipov, Esq.	\$350.00/hour
Anthony J. Miller, Esq.	\$295.00/hour
Alex Berry-Santoro, Esq.	\$265.00/hour
Paralegal	\$95.00 - \$125.00 /hour

Such fees are subject to change. All fees for legal services are subject to Court approval.

WHEREFORE, the Trustee requests that an Order be entered authorizing it to employ OSIPOV BIGELMAN, P.C., as his attorneys in this case. A proposed order is attached hereto as

Exhibit A.

Dated: March 11, 2019

/s/ Kenneth Nathan
Kenneth Nathan (P39142)
Chapter 7 Trustee of the bankruptcy estate
32300 Northwestern Hwy, Suite 200
Farmington Hills, MI 48334
(248) 663-5133

Osipov Bigelman, PC

/s/ Yuliy Osipov
Yuliy Osipov (P59486)
OSIPOV BIGELMAN, P.C.
20700 Civic Center Dr. Suite 420
Southfield, MI 48076
Phone: (248) 663-1800 /Fax: (248) 663-1801
Email: yo@osbig.com

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**ORDER AUTHORIZING EMPLOYMENT OF
OSIPOV BIGELMAN, P.C., AS COUNSEL FOR CHAPTER 7 TRUSTEE**

The Chapter 7 Trustee having filed his Application to Employ OSIPOV BIGELMAN, P.C., as Counsel for Trustee with attached affidavit and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

(A) OSIPOV BIGELMAN, P.C., and its attorneys, including Yuliy Osipov, is authorized to act as counsel for the Trustee in this case pursuant to the terms and conditions set forth in the Application and its supporting Affidavit;

(B) Compensation may be paid after application and after Court order authorizing payment.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
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_____ /

STATEMENT OF DISINTERESTEDNESS

STATE OF MICHIGAN)
) ss.
COUNTY OF OAKLAND)

YULIY OSIPOV, being first duly sworn, states as follows:

1. I am employed by the Firm of OSIPOV BIGELMAN, P.C., whose offices are located at 20700 Civic Center Drive, Suite 420, Southfield, Michigan 48076 (the "Firm").

2. I am authorized to make this Affidavit on behalf of the Firm.

3. To the best of my information, knowledge and belief, neither I nor any member of the Firm represents or holds any interest adverse to the estate.

4. To the best of my information, knowledge and belief, neither I nor any member of the Firm has any connections with the Debtors, creditors, the Trustee, or any other party in interest, their respective known attorneys or accountants, the United States Trustee or any other person employed by the United States Trustee.

5. I have been advised that the Debtors have numerous creditors and, accordingly, the Firm may have rendered services or had business associations with such creditors or their counsel in the ordinary course of the Firm's business, but none of these services have been in connection with, nor impact this proceeding.

6. The other members of the Firm and I are "disinterested persons" as such term is

defined in 11 U.S.C. § 101(14) of the Bankruptcy Code.

7. The Firm has not made any agreement to share compensation in this case and affiant knows of no reason why the Firm should not act as attorneys for the Trustee.

OSIPOV BIGELMAN, P.C.

Dated: March 11, 2019

/s/ Yuliy Osipov
Yuliy Osipov (P59486)
OSIPOV BIGELMAN, P.C.
20700 Civic Center Drive, Ste. 420
Southfield, MI 48076
Phone: (248) 663-1800 /Fax: (248) 663-1801
Email: yo@osbig.com

Subscribed and sworn to before
me this 11th day of March 2019

/s/ Monique Kallabat
Monique Kallabat
Notary Public, State of Michigan
County of Oakland
My commission expires: September 26, 2022
Acting in the County of Oakland

EXHIBIT B